

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

This document relates to:
All Actions

DECLARATION OF DEBRA PAGAN

I, Debra Pagan, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am a paralegal at Kreindler & Kreindler LLP (“Kreindler”) and am involved in Kreindler’s work in the *In re Terrorist Attacks on September 11, 2001* suit.
2. I was asked to provide a declaration in connection with this Court’s inquiry into how investigative reporter Michael Isikoff obtained a copy or portions of the deposition transcript of Kingdom of Saudi Arabia official Musaed al-Jarrah (“Jarrah”).
3. On June 17 and 28, 2021, I received an email from Golkow Litigation Services with the rough transcript of the Jarrah deposition transcripts. I forwarded those to Kreindler employee Julia Sienski. On June 29, 2021, I received an email from Golkow that included a link providing access to the final Jarrah transcripts, which I forwarded to Julia Sienski.
4. My specific answers to the inquiry of this Court’s Order, ECF No. 7082 at 2, (set forth in italics) are underscored below:
 - *whether the declarant shared with anyone any portion of the Al Jarrah deposition transcript (either by providing copies of any portion of the transcript, reading any portion of the transcript, or describing it);*

- I shared the Jarrah transcripts with the law firm Baumeister & Samuels. I did not share any portion of the Jarrah transcripts with anyone else.
- *identify and describe all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021.*
- I have never had any communications with Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: 
Debra Pagan
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181